

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

In Re:

MARK LEON, JR , Case No. 6:15-bk-00375-KSJ

Debtor. Chapter 13

**RESPONSE TO DEBTOR'S OBJECTION
TO CLAIM NO. 8**

COMES NOW CALVARY SPV I, LLC - ASSIGNEE OF CAPITAL ONE, N.A.
(hereinafter "CALVARY SPV I, LLC"), by and through undersigned counsel, and hereby
responds to the Debtor's Objection to Claim No. 8 [Docket No. 31], and states:

1. On January 25, 2013, the Debtor acquired a **2013 POLARIS ATV, VIN: 4XAJT9EA6DF680837** ("Collateral") pursuant to a loan from CALVARY SPV I, LLC.
2. CALVARY SPV I, LLC holds a lien on the Collateral, and is indicated on the Certificate of Title as the lienholder.
3. The balance due CALVARY SPV I, LLC pursuant to its proof of claim is \$16,674.33.
4. The Debtor provided documentation indicating the Debtor sold the Collateral in January, 2014 for \$10,000, but did not use any of the proceeds to pay the lien.

5. CALVARY SPV I, LLC objects to the issues raised in the Objection and requests the Court to set this matter for preliminary hearing.

/s/DENNIS J. LEVINE, ESQ.
DENNIS J. LEVINE, ESQ.
Fla. Bar No. 375993
DAVID E. HICKS, ESQ.
Fla. Bar No. 0368245
ALISON VERGES WALTERS, ESQ.
Fla. Bar No. 0679402
KELLEY KRONENBERG ATTORNEYS AT LAW
1511 N. Westshore Blvd., Suite 400
Tampa, FL 33607
813-223-1697
(813) 433-5275 (fax)
E-mail: dlevine@kelleykronenberg.com
Attorneys for CALVARY SPV I, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Response to Objection to Claim has been furnished either by electronic or standard first class mail to the parties listed below on this 20th day of July, 2015.

/s/DENNIS J. LEVINE, ESQ.

Mark Leon, Jr
21 Sandusky Rd
South Daytona, FL 32119

Robert Zipperer, Esq.
224 S. Beach St., Suite 202
Daytona Beach, FL 32114

Laurie Weatherford, Trustee
P.O. Box 3450
Winter Park, FL 32790